# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

FACTORY MUTUAL INSURANCE : Civil Action No. 05-96 JJF

COMPANY, a/k/a FM GLOBAL : a/s/o Catalog Resources, Inc., d/b/a :

CLIENTLOGIC, a Subsidiary of ClientLogic Operation Company,

:

and

•

THE HARTFORD a/s/o Vivre, Inc.,

•

Plaintiffs,

:

 $\boldsymbol{V}_{\boldsymbol{\alpha}}$ 

:

EAST COAST ERECTORS, INC.,

LIGHTHOUSE CONSTRUCTION, INC., :
BECKER MORGAN GROUP, INC., and :
O'DONNELL, NACCARATO & :

MACINTOSH, INC.,

:

Defendants.

#### NOTICE OF DEPOSITION

### TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned counsel will take the oral deposition of Dale Seemans, on Thursday, September 22, 2005 beginning at 4:00 p.m., or immediately after completion of Frank Davis' deposition, and will take place in the law offices of Chrissinger & Baumberger located at Three Mill Road, Suite 301, Wilmington, Delaware 19806.

WETZEL & ASSOCIATE, P.A.

/s/ Natalie M. Ippolito

Benjamin C. Wetzel, III (#985)
Natalie M. Ippolito (#3845)
The Carriage House, Suite 201
1100 N. Grant Avenue
Wilmington, DE 19805
(302) 652-1200

## /s/ Robert B. Hill

Robert B. Hill, admitted Pro Hac Vice McLAIN & MERRITT, P.C. 3445 Peachtree Road, Suite 500 Atlanta, GA 30326-3240

Attorneys for Defendant East Coast Erectors, Inc.

Dated: September 15, 2005

#### **CERTIFICATE OF SERVICE**

I hereby certify that on 9/15/05, I electronically filed DEFENDANT EAST COAST ERECTORS, INC.'S NOTICE OF DEPOSITION with the Clerk of Court using EM/ECF which will send notification of such filing to the following:

David J. Baumberber, Esquire Chrissinger & Baumberger Three Mill Road, Suite 301 Wilmington, DE 19806

James F Bailey, Jr, Esquire Bailey & Associates Three Mill Road, Suite 306A Wilmington, DE 19806

Robert K Beste, Jr., Esquire Cohen, Seglias, Pallas, Greenhall & Furman, PC Nemours Building 1007 Orange Street, Suite 205 Wilmington, DE 19801 Frank E. Noyes, II, Esquire White & Williams, LLP PO Box 709 Wilmington, DE 19899-0709

Sean J. Bellew, Esquire Cozen O'Connor Chase Manhattan Centre 1201 N. Market Street, Suite 1400 Wilmington, DE 19801

I hereby certify that on 9/15/05, I will mail by United States Postal Service, the document to the following non-registered participants:

Victoria K. Petrone, Esquire Tighe, Cottrell & Logan, PA PO Box 1031 Wilmington, DE 19899

Steven K. Gerber, Esquire Cozen O'Connor 1900 Market Street Philadelphia, PA 19103

Bruce W. McCullough, Esquire McCullough & McKenty 1225 N. King Street, Suite 1100 PO Box 397 Wilmington, DE 19899 Ron L. Pingitore, Esquire White & Williams, LLP 1800 One Liberty Place Philadelphia, PA 19103

Dana Ostrovsky, Esquire Coghen, Seglias, Pallas, Greenhall & Furman, PC 11<sup>th</sup> Floor, 1515 Market Street Philadelphia, PA 19102

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